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12 7 Attorneys for Defendants
13 BAC HOME LOANS SERVICING, L.P. and
14 BANK OF AMERICA CORPORATION

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16 **UNITED STATES DISTRICT COURT**
17 **NORTHERN DISTRICT OF CALIFORNIA**

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19 13 MEHDI RAVAN and ALI RAVAN,

20 14 Plaintiffs,

21 15 v.

22 16 AMERICAN MORTGAGE EXPRESS
23 17 CORP; BANK OF AMERICA HOME
24 LOANS SERVICING, L.P.; BANK OF
25 AMERICA CORPORATION; and DOES 1-
26 100, inclusive,

27 19 Defendants.

28 20

21 Case No. 3:11-CV-02371 EMC

22 **JOINT STIPULATION EXTENDING
23 DEFENDANTS' TIME TO RESPOND TO
24 COMPLAINT ; ORDER**

25 **[L.R. 6-1(a)]**

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Two Embarcadero Center, Suite 1410
San Francisco, CA 94111-3907

STIPULATION

2 Defendants BAC Home Loans Servicing, L.P. and Bank of America Corporation.
3 (“Defendants”), and Plaintiffs Mehdi Ravan and Ali Ravan (“Plaintiffs”), by and through their
4 counsel of record, hereby stipulate and agree as follows:

5 1. Defendant BAC Home Loans Servicing, L.P. removed this matter from Alameda
6 County Superior Court on May 13, 2011.

7 2. After removal to federal court, Defendants have seven (7) days to respond to
8 Plaintiffs' Complaint. However, Plaintiffs and Defendants are in the process of discussing the
9 informal resolution of this matter.

10 3. In order to continue the current settlement discussions, reduce cost of litigation for
11 both parties, and potentially unburden the Court's docket, Plaintiffs grant Defendants an extension
12 to respond to their Complaint. Thus, instead of responding to the Complaint on May 20, 2011
13 (seven days after removal to federal court), the parties agree that Defendants' time to file and
14 serve their response to the Complaint is extended up to and including August 17, 2011. No trustee
15 sale will be issued prior to this date. August 17, 2011 is also the parties last day to file a Rule
16 26(f) report, in advance of the Initial Case Management Conference currently set for August 24,
17 2011. Thus, this stipulation will not alter any pre-existing court event or deadline, and is
18 submitted without a court order pursuant to Local Rule 6-1(a).

19 4. The stipulation will not result in prejudice to any party and its impact on judicial
20 proceedings is not expected to be significant.

21 5. Nothing in this stipulation shall constitute a waiver of any arguments or defenses
22 that Defendants or Plaintiffs may wish to assert in their pleadings, all of which are expressly
23 reserved.

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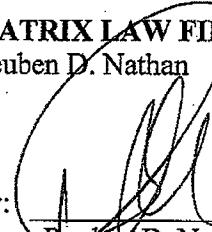
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1 IT IS SO STIPULATED.
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5 Dated: May 18, 2011
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MATRIX LAW FIRM, APC
Reuben D. Nathan

9 By: 
10 Reuben D. Nathan
11 Attorney for Plaintiffs
12 MEHDI RAVAN and ALI RAVAN
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15 Dated: May 20, 2011
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17

BRYAN CAVE LLP
Robert A. Padway
Deborah A. Goldfarb
Nadia M. Bishop

18 IT IS SO ORDERED
19
20 Edward M. Chen
21 U.S. District Court
22 IT IS SO ORDERED
23 
24 Judge Edward M. Chen
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By: 
Nadia M. Bishop
Attorneys for Defendants
BAC HOME LOANS SERVICING, L.P., AND
BANK OF AMERICA CORPORATION
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